



**Filed via ECFS**

January 18, 2016

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, DC 20554  
Attn: Wireline Competition Bureau

Re: Connect America Fund, WC Docket No. 10-90

Dear Ms. Dortch,

Reservation Telephone Cooperative (“Reservation” or the “Company”), Study Area Code 381632, hereby notifies the Federal Communications Commission (“FCC” or “Commission”) and the Wireline Competition Bureau (“WCB” or “Bureau”) of changes that the Company made to its FCC Form 477 on January 12, 2016. The changes described herein contribute to a significant impact in the Alternative Connect America Model (“A-CAM”) for Reservation’s neighboring Incumbent Local Exchange Carriers (“ILECs”), listed below. Reservation respectfully requests that the Commission incorporate its modified Form 477 in the A-CAM and ensure that no impact is caused to the Company or its neighboring ILECs in North Dakota as a result of Reservations previously-filed Form 477.

Reservation’s previously-filed FCC Form 477 containing data as of December 31, 2014 had incorrectly identified numerous census blocks outside of Reservation’s study area as having broadband service deployed by Reservation. The mislabeled blocks were an inadvertent error that came to light when Reservation and its neighboring ILECs began reviewing the A-CAM in depth.

Once Reservation realized that its reported broadband service area was “bleeding over” into neighboring ILECs, the Company immediately took action and submitted revised data on January 12, 2016. However, Reservation remains concerned that

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these changes will not be incorporated into the forthcoming versions of the A-CAM in a timely manner. Reservation respectfully requests that the FCC allow these corrections to be included in the A-CAM as soon as possible to reflect accurately these facts. Without these corrections, future versions of the A-CAM will not reflect the facts pertaining to the census blocks served by Reservation and its neighboring North Dakota ILECs with the correct broadband technology and service area. Without these corrections, the Commission's universal service policy for the North Dakota ILECs study areas will be challenged as the amount of support available will not be sufficient to advance broadband technology in the area.

Sincerely,

Shane D. Hart, CEO/General Manager  
Reservation Telephone Cooperative

cc: Consolidated Telcom  
West River Telecom  
SRT Communications, Inc.  
Midstate Communications Inc.  
Midstate Telephone Company  
Northwest Communications Cooperative

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